

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
Mark B. Galvin and Jenny G. Galvin,	)	
	)	
Plaintiffs,	)	
v.	)	
	)	
U.S. BANK, National Association, as	)	
Trustee Relating to Chevy Chase Funding,	)	Case No. 14-14723
LLC Mortgage Back Certificates	)	
Series 2007-1, Mortgage Electronic	)	
Registration Systems, Inc., and Capital	)	
One, N.A., a/k/a Capital One Bank, f/k/a	)	
Chevy Chase Bank, FSB,	)	
	)	
Defendants.	)	
_____	)	

**MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants U.S. Bank, N.A., as Trustee Relating to Chevy Chase Funding, LLC Mortgage Back Certificates Series 2007-1 ("U.S. Bank Trustee") and Mortgage Electronic Registrations Systems, Inc. ("MERS") and together with U.S. Bank Trustee, the "Defendants"), by and through the undersigned counsel, respectfully move the Court for an Order extending the time within which Defendants may respond to the Complaint filed in this action. In support of this motion, Defendants state as follows:

1. Plaintiffs, Mark B. Galvin and Jenny G. Galvin (the "Plaintiffs") filed this action in Dukes County Superior Court (Massachusetts) on November 18, 2014.
2. As of today, Defendants have yet to be served with the Complaint. However, on November 24, 2014, they received a copy of the Complaint informing them of the pending litigation.

3. Defendants timely removed this action within 30 days after receipt of the complaint, as required under 28 U.S.C. § 1446(b)(1), from Dukes County Superior Court (Massachusetts) to this Court on December 24, 2014. Accordingly, pursuant to Fed. R. Civ. P. 81(c), Defendants presently have until December 31, 2014, to serve a response to the Complaint.
4. Defendants have not previously requested any extension of time of the deadline to respond to the Complaint, and the time to file a response to the Complaint has not yet expired.
5. Defendants request an extension of time to file a responsive pleading because, in light of the days in which the upcoming holidays fall and the vacation time of Defendants' counsel, additional time is needed to respond to the allegations of the Complaint.
6. An order granting Defendants' current Motion will not prejudice the Plaintiffs or co-defendant, Capital One, N.A., a/k/a Capital One Bank, f/k/a Chevy Chase Bank, FSB ("Capital One"), because, as of today, Plaintiffs have failed to serve any of the Defendants with the Complaint and, therefore, no deadlines are currently pending.
7. Accordingly, as an extension of time would not prejudice the Plaintiffs or Capital One, Defendants have shown good cause to extend the time within which they may serve a response to the Complaint, to and including January 14, 2015.

WHEREFORE, Defendants, U.S. Bank Trustee and MERS, respectfully request that the Court order that the time within which Defendants may serve a response to the Complaint be extended, to and including January 14, 2015.

Respectfully submitted,

U.S. BANK, National Association, as  
Trustee Relating to Chevy Chase Funding,  
LLC Mortgage Back Certificates Series  
2007-1, and Mortgage Electronic  
Registration Systems, Inc.,

*/s/ Kevin P. Polansky*

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Dated: December 24, 2014

CERTIFICATE OF SERVICE

I, Kevin P. Polansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Dated: December 24, 2014

*/s/ Kevin P. Polansky*